

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No. 20 CR 543

v.

DARIUS YOUNG,
JAHEIM HENYARD, and
XAVIER TATE

Violations: Title 18, United States Code,
Sections 922(g)(1), 924(c)(1)(A)(ii),
1951(a), and 2119

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

On or about July 17, 2020, at Oak Park, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,

defendant herein, with the intent to cause death and serious bodily harm, did knowingly attempt to take, by force, violence, and intimidation, a motor vehicle, namely, a white Mercedes GLC 300 bearing VIN WDC0J4KB1HF229373, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim A;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about July 17, 2020, at Oak Park, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,

defendant herein, did use, carry and brandish a firearm, during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 14, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,

defendant herein, did obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, as “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b), in that the defendant did knowingly take and obtain a White Dodge Charger SE bearing VIN 2C3CDXBGXHH660403 from the person and in the presence of Victim B, an employee of Uber Eats, on the 3000 block of North Elston in Chicago, Illinois, against his will, by means of actual and threatened force, and fear of injury to Victim B;

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 14, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,

defendant herein, with the intent to cause death and serious bodily harm, did knowingly take, by force, violence, and intimidation, a motor vehicle, namely, a White Dodge Charger SE bearing VIN 2C3CDXBGXHH660403, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim B;

In violation of Title 18, United States Code, Section 2119.

COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 20, 2020, at Cicero, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,

defendant herein, with the intent to cause death and serious bodily harm, did knowingly take, by force, violence, and intimidation, a motor vehicle, namely, a white Kia Optima Hybrid LX with VIN KNAGM4AD1D5038824, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of Victim C;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT SIX

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 21, 2020, at Oak Park, in the Northern District of Illinois,
Eastern Division,

JAHEIM HENYARD,
XAVIER TATE, and
DARIUS YOUNG,

defendants herein, did obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, as “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b), in that the defendants did knowingly take and obtain parcels from the person and in the presence of Victim D, an employee of the United Parcel Service, on the 1100 block of Highland Avenue in Oak Park, Illinois, against his will, by means of actual and threatened force, and fear of injury to Victim C;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about August 21, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

XAVIER TATE,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Keltec P11 9mm semiautomatic handgun bearing serial number 105516, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as charged in Count Seven of this Indictment, defendant Xavier Tate shall forfeit to the United States of America any firearms and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Keltec P11 9mm semiautomatic handgun bearing serial number 105516.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY